

Country Connections LLC  
36 Washington Square  
Washington Court House Ohio 43160  
Sept 14 2010

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: TV White Spaces  
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, Country Connections LLC, provides fixed wireless broadband service in South Central Ohio. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no broadband choices. We built most of our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in the South Central Ohio area can now get broadband service. Country Connections LLC serves a very rural market with well under one customer per square mile, and we have many households who would like service but we cannot service because of distance and trees.

Country Connections LLC is very interested in utilizing television white spaces so that we can expand and improve service. Some of our obstacles include distance between homes, trees, lack of towers and hills. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying or not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the

endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

In conclusion, allowing WISP to use TVWS would be an economic stimulus to the rural communities that Country Connections LLC serves. We already have many customers who use our service, and are able to stay at home and work or teach. Unfortunately we have many more potential customers who we are unable to service because of location, trees, other obstacles, distance, lack of towers etc. The TVWS would help many rural households have the same advantages in society that our city cousins have.

Sincerely,

Larry Schriver, President